

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**ALCLAIR WHITE,**

*Plaintiff,*

**v.**

**CHEVRON PHILLIPS CHEMICAL  
COMPANY, LP,**

*Defendant.*

§  
§  
§  
§  
§  
§  
§

**C.A. NO. 4:19-cv-00187**

**UNOPPOSED MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Defendant Chevron Phillips Chemical Company LP (“CPChem”) hereby files this Unopposed Motion to Withdraw and Substitute Counsel, and in support thereof, respectfully shows the Court the following:

1. Dennis P. Duffy, Joseph R. Buller, III, and the law firm of Baker Hostetler LLP are presently counsel of record for CPChem.
2. CPChem has recently retained new counsel to represent it for this case.
3. CPChem respectfully requests that Mr. Duffy, Mr. Buller, and the law firm of Baker Hostetler LLP be permitted to withdraw as counsel of record for CPChem in this case.
4. CPChem requests that Shauna Johnson Clark and Kimberly Cheeseman, along with their law firm, Norton Rose Fulbright US LLP, be substituted as counsel of record for CPChem in this case. Shauna Johnson Clark will be the attorney-in-charge.
5. Counsel for Plaintiff is unopposed to this request.
6. CPChem’s new counsel is prepared to depose Plaintiff on March 2, 2020, as previously noticed. Substitution of counsel will not delay the proceedings, and

CPCChem requests that the Court deny any request to extend discovery or re-schedule Plaintiff's deposition, as this case has been pending since January 2019.

7. This withdrawal and substitution is not made for the purpose of delay, but so that justice may be done.

WHEREFORE PREMISES CONSIDERED, Defendant Chevron Phillips Chemical Company LP requests that Dennis P. Duffy, Joseph R. Buller, III, and their law firm of Baker Hostetler LLP may withdraw and be discharged as counsel of record for Defendant Chevron Phillips Chemical Company LP in this case, and that Shauna Johnson Clark and Kimberly Cheeseman, along with their law firm, Norton Rose Fulbright US LLP, be substituted as its attorneys of record.

Dated: February 20, 2020

Respectfully Submitted,

**BAKER HOSTETLER LLP**

/s/ Dennis Duffy

Dennis P. Duffy  
Texas Bar No. 06168900  
Federal ID No. 1502  
[dpduffy@bakerlaw.com](mailto:dpduffy@bakerlaw.com)

Joseph R. Buller III  
Texas Bar No. 24110784  
Federal ID No. 3355457  
[jbuller@bakerlaw.com](mailto:jbuller@bakerlaw.com)

811 Main Street, Suite 1100  
Houston, Texas 77002  
Phone: (713) 646-1364  
Fax: (713) 751-1717

**NORTON ROSE FULBRIGHT US LLP**

/s/ Shauna Johnson Clark

Shauna Johnson Clark (*Attorney-in-Charge*)

Texas Bar No. 00790977  
Federal ID No. 18235  
[shauna.clark@nortonrosefulbright.com](mailto:shauna.clark@nortonrosefulbright.com)

Kimberly F. Cheeseman  
Texas Bar No. 24082809  
Federal I.D. No. 2254668  
[kimberly.cheeseman@nortonrosefulbright.com](mailto:kimberly.cheeseman@nortonrosefulbright.com)

1301 McKinney Street, Suite 5100  
Houston, TX 77010-3095  
Telephone: (713) 651-5151  
Facsimile: (713) 651-5246

*Attorneys for Defendant Chevron Phillips  
Chemical Company LP*

### **CERTIFICATE OF CONFERENCE**

I certify that counsel for Defendant conferred with counsel for Plaintiff, and Plaintiff is unopposed to the relief sought herein.

/s/ Kimberly Cheeseman  
Kimberly F. Cheeseman

### **CERTIFICATE OF SERVICE**

This pleading was served on the following opposing counsel via the Court's CM/ECF service in compliance with Rule 5 of the Federal Rules of Civil Procedure on February 20, 2020.

Alfonso Kennard, Jr.  
Eddie R. Hodges, Jr.  
Kennard Law, P.C.  
2603 Augusta Dr., 14th Floor  
Houston, Texas 77057

/s/ Kimberly Cheeseman  
Kimberly F. Cheeseman